

PATENT

File: MCEA-P3-03

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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Inventors	:	CONROY, Thomas F., EISENBERG, Steven A., KRAYSLER, Stephen F., MANN, Richard W.
Serial No.	:	10/687,063
Filed	:	October 16, 2003
For	:	COMPUTER SYSTEM FOR MANAGING FLUCTUATING CASH FLOW(S)
Group Art Unit	:	3691
Examiner	:	SHRESTHA, Bijendra K.

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MS: Petitions  
Commissioner of Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**PETITION TO CHANGE SUBCLASSIFICATION**

S I R :

Applicant respectfully petitions for a change of subclass. The current subclass is listed as 38, which is believed appropriate, but the PTO web site shows the patent application as also in subclass 36T, which is believed to be inappropriate.

Subclass 36T is for tax strategies, but Applicant's claims do not mention tax and the inventive concepts in the application are not believed to be tax strategies, and thus is in error.

It is respectfully suggested that, if any additional subclass were to be listed, the appropriate subclass should be subclass 4 (Insurance). Attention is drawn to, Claim 1, which mentions

...

receiving respective descriptions of risks;

receiving statistical assumptions for said risks;

receiving financial assumptions for said risks;  
calculating, from the descriptions and the assumptions, expected cash flows  
corresponding to said risks for time periods;  
receiving actual cash flows information from occurrence of events corresponding to  
said risks;  
...

Dependent claims 5-8, for example, mention insurance, and claim 10 mentions  
reinsurance.

Attention is drawn to Rule 1.75; MPEP section 903.04 Rules for classification,  
original; and MPEP section 903.08a-e Internal guidelines for classification and transfers.

It is respectfully submitted that the above-identified patent application is improperly  
subclassified in subclass 36T. If any subclass beyond 38 is to be mentioned, it is suggested that  
subclass 4 is a more appropriate subclass.

The Commissioner is hereby authorized to charge any fees associated with the  
above-identified patent application, or credit any overcharges to Deposit Account No. 50-0235.

Please direct all communication to the undersigned at the address given below.

Respectfully submitted,



Date: December 10, 2007

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